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March 30, 2000

FACSIMILE AND REGULAR MAIL

The Honorable Catherine C. Blake  
United States District Court for the District of Maryland  
U.S. Court House  
101 W. Lombard Street, 4th Floor  
Baltimore, Maryland 21201

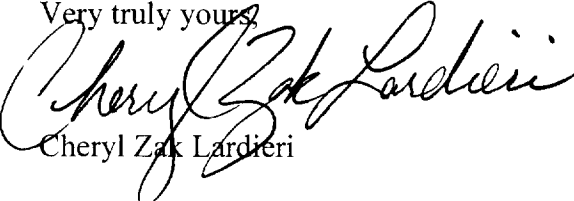
Re: Watts, et al. v. Fresenius USA, Inc.  
Case No.: CCB 98-1430

Dear Judge Blake:

As you are aware, Judge Grimm has asked the parties to confer on a proposed scheduling order for limited discovery. The parties have agreed that, at this juncture, depositions should be limited to the plaintiffs, plaintiffs' causation expert(s), and defendants' causation expert(s). We anticipate that we can accomplish those depositions by July 1, 2000. After those depositions have been taken, the parties will re-evaluate their positions to determine whether settlement negotiations would be beneficial before pursuing additional discovery. Please advise whether the agreed upon proposal meets with your approval.

If you have any questions regarding this matter, please do not hesitate to contact me.

Very truly yours,

  
Cheryl Zak Lardieri

CZL/ke



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cc: Clerk  
John J. Kenny, Esquire